

Koch, Kristine

From: Koch, Kristine
Sent: Thursday, December 11, 2014 7:02 AM
To: Jim McKenna (jim.mckenna@verdantllc.com)
Subject: FW: LWG Response to EPA Question on FS Database

Jim – Thanks, but this wasn't what we were looking for.

Kristine Koch
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From: Jennifer Woronets [mailto:jworonets@anchorqea.com]
Sent: Wednesday, December 10, 2014 12:39 PM
To: Koch, Kristine
Cc: Amanda Shellenberger; Bob Wyatt; Carl Stivers; Jennifer Woronets; Jim McKenna (jim.mckenna@verdantllc.com); King, Todd W.; Mullin, Jeanette; Patty Dost; Scott Coffey (coffeyse@cdmsmith.com); Sheldrake, Sean
Subject: LWG Response to EPA Question on FS Database

Kristine,

The following email is provided on behalf of Carl.

As requested, this email provides a summary of the prior correspondence with LWG's position on adding data to the FS database. The LWG has previously stated concerns with EPA's intent to add data to the FS database in our July 9, 2014 memorandum to EPA regarding EPA's proposed dredge depth approach for the revised FS and in August 29, 2014 LWG comments on EPA's draft revised FS Section 1. A summary of these previously stated concerns are:

- 1) EPA has not established a consistent rationale or plan for selection and use of new harbor data in the updated FS database.
- 2) EPA indicated that new data would be used in some but not all FS evaluations. However, in the absence of a pre-existing plan for how and where new data will or will not be used in various FS evaluations, EPA decisions could result in inconsistent usage of new data, which will likely confuse the revised FS text and presentations.
- 3) Without a clear data usage plan, it will be difficult to determine whether any changes in revised FS conclusions as compared to draft FS conclusions are based on data changes, changes in technical evaluation methods, or both.

Please let us know if you have any questions.

Thank you,
Jen Woronets ☺
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